

**LAGOMARSINO LAW**

ANDRE M. LAGOMARSINO, ESQ.  
Nevada Bar No. 6711  
3005 W. Horizon Ridge Pkwy., Suite 241  
Henderson, Nevada 89052  
Telephone: (702) 383-2864  
Facsimile: (702) 383-0065  
AML@lagomarsinolaw.com  
*Attorney for Plaintiff Trinita Farmer*

**UNITED STATES DISTRICT COURT****CLARK COUNTY, NEVADA**

TRINITA FARMER, individually,  
  
Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; KENNETH LOPERA,  
individually; TRAVIS CRUMRINE, individually;  
MICHAEL TRAN, individually; MICHAEL  
FLORES, individually,

Defendants.

CASE NO: 2:18-cv-00860-GMN-VCF

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND BRIEFING  
DEADLINES TO DEFENDANTS LVMPD,  
CRUMRINE, FLORES AND TRAN'S  
MOTIONS FOR SUMMARY JUDGMENT  
(ECF NO. 125)**

*(Second Request)*

WHEREAS Defendants Las Vegas Metropolitan Police Department, Travis Crumrine, Michael Flores, and Michael Tran collectively filed a Motion for Summary Judgment on December 16, 2019 (ECF No. 125). The parties have previously filed a Stipulation and Order to Extend Briefing Deadlines (First Request) on December 23, 2019 (ECF No. 142).

Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for Plaintiff to file her Response to Defendants Las Vegas Metropolitan Police Department, Travis Crumrine, Michael Flores, and Michael Tran's Motion for Summary Judgment. The current deadline for Plaintiff to respond to Defendants' Motions for Summary Judgment is January 13, 2020. The new deadline for Plaintiff to respond to the collective Defendants Motion for Summary Judgment will be January 20, 2020.

This extension is the second request and is not for the purpose of delay but rather because defendants motion is extensive and voluminous, plaintiff requires a thorough and thoughtful response;

1 plaintiff will be filing her response to Defendant Lopera's Motion for Summary Judgment today,  
2 January 13, 2020 and will require additional time to respond to the collective defendants Las Vegas  
3 Metropolitan Police Department, Travis Crumrine, Michael Flores, and Michael Tran's motion for  
4 summary judgment. Plaintiff's counsel does not believe both briefs can be filed simultaneously today,  
5 January 13, 2020.

6 This case also involves thousands of documents and twenty-eight depositions that have to be  
7 cited to the Court for decision on Defendant's Motion. Plaintiff's counsel and most of his firm have  
8 been working on the oppositions for weeks.

9 This extension is made in good faith and is not intended for purposes of delay.

10 **IT IS SO STIPULATED AND AGREED.**

11 DATED this 13th day of January, 2020.

DATED this 13th day of January, 2020.

12 **LAGOMARSINO LAW**

**MARQUIS AURBACH COFFING**

13 /s/ Andre Lagomarsino

/s/ Craig R. Anderson

14 Andre M. Lagomarsino, Esq. (#6711)  
15 3005 West Horizon Ridge Parkway, Suite 241  
16 Henderson, Nevada 89052  
*Attorney for Plaintiff Trinita Farmer*

Craig R. Anderson, Esq. (#6882)  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for Defendants LVMPD,  
Crumrine, Tran, and Flores*

**ORDER**

19 **IT IS SO ORDERED.**

20 **Dated this 13 day of January, 2020.**

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24 Gloria M. Navarro, District Judge  
25 UNITED STATES DISTRICT COURT  
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